



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

September 30, 2009

Lois Foster, Travel Planning IDT Leader
Kamiah Ranger Station
Rt. 2, Box 191
Kamiah, ID 83536

**RE: U.S. Environmental Protection Agency (EPA) review and comments for the
Clearwater National Forest (CNF) Travel Planning Draft Environmental Impact
Statement (DEIS). EPA Project Number: 07-064-AFS**

Dear Ms. Foster:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have concerns about potential impact of the proposed Travel Management Plan (TMP) on water quality and have therefore assigned an Environmental Concerns – Insufficient Information (EC-2) rating to the EIS based on Alternative C. A copy of the EPA rating system is enclosed.

EPA acknowledges that the TMP process is a positive step in addressing resource impacts from motorized uses. The permanent prohibition of cross country travel, simplification of seasonal restrictions and inclusion of over snow vehicles in travel planning will likely contribute to the achievement of significant environmental benefits. We especially commend the Clearwater National Forest (CNF) for including over the snow vehicle travel in this travel planning process.

While supporting these potential environmental benefits we remain concerned about Alternative B in general and certain elements of Alternative C. We also believe the DEIS's watershed resources analysis insufficiently supports the conclusion that the action alternatives will meet water quality standards. Alternative B fails to protect fish by designating, for example, all of the existing stream crossings in Cayuse Creek - an important westslope cutthroat trout-producing stream. Alternative B would also fail to reduce wildlife disturbance from snowmobile use in recommended wilderness areas. Alternative C, the CNF's preferred alternative, is more environmentally protective than Alternative B but we believe the DEIS does not provide sufficient information to conclude that any of the action alternatives would meet water quality standards. In addition, difficult to enforce off-route exceptions for special corridors (e.g., complex conditions for "Selecting a Route to a Campsite") may inadequately reduce environmental risks from dispersed recreation under each of the action alternatives.

We recommend the selection of Alternative D. Alternative D is the most environmentally protective – especially in the provision of wildlife security habitat – and is simultaneously the most consistent with CNF's recreation niche. We also recommend the inclusion of additional information related to water quality standards. For example, we suggest that the FEIS explicitly link the predicted impacts of each of the alternative's route designations to relevant TMDLs, Subbasin Assessments, Idaho Anti-degradation Policy and PACFISH/INFISH Riparian Management Objectives (RMO). If Alternative D is inconsistent with water quality standards we recommend the incorporation of additional water quality emphasis elements.

Thank you for this opportunity to comment and if you have any questions or concerns please contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

/s/

Teresa Kubo, Acting Manager
Environmental Review and Sediment Management Unit

Enclosures:

EPA Region 10 Detailed Comments for the Clearwater National Forest Travel Planning Draft
Environmental Impact Statement
EPA Rating System for Draft Environmental Impact Statements

EPA REGION 10 DETAILED COMMENTS FOR THE CLEARWATER NATIONAL FOREST TRAVEL PLANNING DRAFT ENVIRONMENTAL IMPACT STATEMENT

Watershed Resources

We believe that the designation of motorized routes and the management of their use is an integral part of meeting water quality standards and we applaud your substantial road abandonment program. The current travel planning process is an opportunity to continue your excellent work.

We are concerned that the DEIS does not include sufficient information to conclude that any of the action alternatives meet all relevant water quality standards and policies. The DEIS contains a high level of detail, but does not sufficiently link the aquatics and fisheries affected environments to environmental consequences.

Table 1-3 in the DEIS states that the project will move toward fish and water quality objectives and adhere to State water quality standards and Best Management Practices (BMPs), but there is no additional specific information to support this conclusion. Instead the DEIS implies that the water quality standards and BMPs referenced in Table 1-3 will be met through the reductions disclosed for each watershed resource issue indicator. While we agree that decreased motorized route densities, miles of roads and trails in riparian areas and stream crossings will be beneficial for watershed resources we are unsure whether the proposed reductions will meet water quality standards.

For example, we understand that the 889 road miles open to motorized travel within riparian areas under Alternative A are a result of the CNF's 2002 Roads Analysis and represent a minimum system. Road miles in riparian areas have a relatively high likelihood of adverse impacts for watershed resources (sediment input, stream shading etc.). If the 889 miles of roads in riparian areas under the existing condition are consistent with water quality standards (e.g., relevant TMDLs), then we would support the designation of 889 miles of these roads under all of the action alternatives. If, however, the 889 miles of current motorized roads in riparian areas are inconsistent with water quality standards we would recommend that the FEIS consider an action alternative which is more consistent with water quality standards. Our concerns with each of the issue indicators for watershed resources are conceptually similar. What is the relative consistency of the alternatives, including no-action, with water quality standards?

Recommendation

To ensure that the CNF proposes an action alternative that is consistent with water quality standards we recommend the FEIS include additional information linking proposed route designations to relevant specific water quality standards. We are particularly interested in how the action alternatives will meet standards such as those found in relevant Total Maximum Daily Load¹ (TMDL) allocations and Subbasin

¹South Fork Palouse River TMDL, Palouse River TMDL, Upper North Fork Clearwater River TMDL, Lower North Fork Clearwater TMDL, Jim Ford Creek TMDL, Potlatch River TMDL, Palouse Tributaries TMDL

Assessments². Other specific water quality standards include stream habitat variables associated with PACFISH/INFISH Riparian Management Objectives (RMO) and sediment, turbidity and temperature goals from Idaho's Anti-degradation Policy (DEIS, p. 1-27). Where inconsistent we recommend that the FEIS incorporate additional water quality emphasis elements into the preferred alternative. Specific potential water quality emphasis elements may include, but are not limited to:

- Open only those routes which are consistent with CNF forest plan Standards and Guidelines and BMPs.
- Reduce road densities to < 1 mile/sq mi for watersheds with bull trout-bearing streams and to < 2 mi/sq mi for watersheds with salmon-bearing streams;
- Consider motorized recreational use only in those areas that are not contributing to present water quality impairments or degradation to high quality waters, e.g., no designation of routes with high or extreme soil or water risks.

Off-Route Exceptions

Motorized access to dispersed recreation has the potential to cause relatively high and concentrated adverse environmental impacts. Impacts are often concentrated around streams, lakes and other areas of special interest for forest users.

On the CNF we are primarily concerned with potential adverse impacts to watershed resources from dispersed recreation. According to the DEIS, and for all of the action alternatives, "Resource damage that is occurring as a result of repeated travel on user-created routes which access dispersed camping sites, especially in fragile river-adjacent riparian areas and meadows, will continue either at the current rate or increase as motorized recreational use continues to grow." Furthermore, "Existing resource conditions near parts of the North Fork Clearwater River, Orogrande Creek, and Elk Creek include unacceptable resource impacts, including the proliferation of user-created routes to and between campsites, and the pioneering of new campsites with motor vehicles." (DEIS, p. 2-17). We believe the DEIS clearly discloses the substantial current adverse impacts to watershed resources from dispersed recreation on existing routes.

To reduce current and future environmental risks from motorized access to dispersed recreation the CNF proposes a series of off-route exceptions. We generally support the exceptions described in Table 2-3 and understand the reasoning behind the CNF's phased approach to the dispersed recreation issue, e.g., site specific analyses for designated campgrounds. We believe, however, that the original proposed action's approved campsites restriction for off-route travel within 100 feet of certain streams and rivers would have a higher likelihood protecting watershed resources.

Recommendation:

EPA prefers designated motorized routes and areas for dispersed recreation over corridors. In special corridors, we prefer designated campgrounds to off-route exceptions based on conditions that may be difficult to enforce and comply with.

²Lochsa River Subbasin Assessment, Lower Selway River Subbasin Assessment

We recommend that the FEIS include a list of the areas with current, and predicted future, unacceptable resources impacts from dispersed recreation. Please prioritize and disclose a schedule for future campsite designation in especially problematic areas.

Implementation and Administration

We believe that providing for motorized recreation that does not harm sensitive environmental resources can be as much a function of the effective implementation and administration of the MVUM as it is a function of the specific combination of designated routes. Based on our review of this and other Travel Management Plans we are providing the following list of recommendations to supplement your implementation planning.

Recommendations³:

We recommend the consideration of the following suggestions for the implementation and administration plan of the FEIS's preferred alternative.

- Develop supplementary navigational maps in conjunction with the MVUM (e.g., Fishlake National Forest in Utah has been noted for its color maps).
- Improve enforcement through collaboration. See, for example, <http://www.idahoohv.org> to learn more about the Idaho Off-Highway (OHV) Public Information Project.
- Prioritize OHV's contribution to the sedimentation of streams within the implementation and adaptive management planning framework. Providing a management trigger related to water quality standards for sediment may be a useful method for ensuring benefits to the aquatic environment are realized.
- Identify likely problem areas for compliance and enforcement (e.g., traditional dispersed camping areas proposed to be closed).
- Consider special signage about the environmental impacts of firewood gathering in snag habitat.
- Develop partnerships to leverage resources. See "The National Assessment of Travel Management Planning" (footnote 3) for:
 - "Example Charter (Protocols and Ground Rules) for Collaborative Stakeholder Involvement." (p. 79)
 - "Example of Volunteer Recruitment (Building Partnerships)" (p. 76)
 - "Example of User Education: Sharing Resources" (p. 84)

Terrestrial Resources

We agree with the DEIS's conclusions that the primary issue relevant to wildlife associated with implementation of the Travel Planning rule is related to the effects of motorized access on habitat fragmentation and wildlife security. We are concerned that Alternative B has similar effects to habitat security as Alternative A. For this and other reasons we strongly

³ Many of these recommendations have been taken directly from the 5/20/2009 report, "National Assessment of Travel Management Planning: Challenges, Recommendations, and Best Practices for Public Involvement" (<http://www.ecr.gov/pdf/NationalAssessmentOfTm-FullDocument.pdf>).

recommend against Alternative B. We are also concerned about backcountry loop opportunities provided by Alternative C. We recommend that the FEIS incorporate Alternative D's route designations for backcountry Management Areas (MA) into the preferred alternative.

Climate Change

Likely impacts from an increased number of warm days and changes in the amounts and seasonal distributions of rainfall and snowpack include: altered water quantity and quality (e.g. temperature); timing of flow; spatial and temporal shifts of vegetative communities and wildlife habitat; increased frequency and intensity of wildfires; increased potential for bark beetles and other insects; potential increases for invasive species resistance to mitigation measures⁴; and increased opportunities for warm weather recreation.

Recommendations

Because many anticipated climate change impacts will exacerbate the current effect of motorized routes on water quality and fisheries we recommend the consideration of adaptive measures in all relevant USFS processes. We believe a discussion in the FEIS of likely climate change impacts on the CNF will help to disclose how route designation decisions contribute to the Forest's long term climate change adaptation strategy. Of particular interest are the potential cumulative impacts of climate change on the connectivity of wildlife and hydrology (including shallow groundwater contributions to surface waters), threatened and endangered species habitat, fire management, and invasive species management. We recommend that the FEIS discuss how climate change impacts were considered in the development of alternatives.

Suggested Climate Change References

EPA understands that many questions surrounding climate change remain unanswered, including what effects climate change might have on the resources impacted by travel management planning. We believe the following resources, and especially those from the USFS's Climate Change Resource Center, may prove useful as background for any climate change impacts and adaptation discussion.

Botkin, D.B. et al., 2007. Forecasting the effects of global warming on biodiversity. *Bioscience* 57, 227–236.

Grace, J., Berninger, F., Nagy, L., 2002. Impacts of climate change on the tree line. *Annals of Botany* 90, 537–544.

Morin, X., Thuiller, W. 2009. Comparing niche- and process-based models to reduce prediction uncertainty in species range shifts under climate change. *Ecology*, 90(5), 1301-1313

Opdam, P., Wascher, D., 2004. Climate change meets habitat fragmentation: linking landscapes and biogeographical scale levels in research and conservation. *Biological Conservation* 117, 285–297.

⁴ http://www.ars.usda.gov/research/publications/Publications.htm?seq_no_115=134271

Peterson, David L., McKenzie, Don. 2008. Wildland Fire and Climate Change. (May 20, 2008). U.S. Department of Agriculture, Forest Service, Climate Change Resource Center. <http://www.fs.fed.us/ccrc/topics/wildland-fire.shtml>

Ruggiero, Len; McKelvey, Kevin; Squires, John; Block, William. 2008. Wildlife and Climate Change. (May 20, 2008). U.S. Department of Agriculture, Forest Service, Climate Change Resource Center. <http://www.fs.fed.us/ccrc/topics/wildlife.shtml>

SAP 4.4. Adaptation Options for Climate-Sensitive Ecosystems and Resources | National Forests. <http://www.climatescience.gov/Library/sap/sap4-4/final-report/sap4-4-final-report-Ch3-Forests.pdf>.

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987